

**REMARKS/ARGUMENTS**

This Amendment is in response to the Office Action of May 27, 2004, in which the Examiner rejected claims 1-23 under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,483,445 ("**Pickering '445**") and U.S. Patent No. 5,684,965 ("**Pickering '965**"). Applicant respectively traverses such rejection.

As recited in the claims and as explained in the accompanying specification, Applicants' invention is directed to a system and method for managing accounts where more than one customer (cardholder) may be associated with each account. As recited in claim 1, the customers using each account have different roles to the account, and each customer may conduct a transaction "by using a presentation instrument issued to that customer" (e.g., credit card). A database stores and relates a customer ID associated with each customer, an account ID associated with each account, and a presentation ID (card number) associated with each presentation instrument. As further recited, a database management system manages the data in the database, and posts transactions to the account "in response to receiving a presentation ID with such transaction data, the presentation ID being used by the data management system to access the account and thereby reflect that the transaction has been conducted for the account."

As explained in the specification, Applicants' invention of having a separate customer ID for each customer permits the customer ID (and associated data) to be maintained even as presentation IDs (and account IDs) change. As further explained, this has significant advantages, such as when a presentation instrument (credit card) is lost or stolen. The card and card number may be replaced without having to close the account and replace the cards of other customers using the same account (see, for example, paragraphs 20 and 33 through 36 for the specification). Separate customer IDs also permit different customers using the same account to have their transaction activity separately tracked, providing the advantages mentioned at paragraph 31 of the specification.

Further aspects of Applicants' invention are also facilitated by the use of a customer ID separate from a presentation ID or card number. For example, in dependent claims 3, 4 and 16, there is additionally recited a security suspense record assigned or stored in

connection with an account ID so that a lost or stolen card (and presentation ID) may be rendered useable. As a further example, in numerous dependent claims (e.g., claims 9, 10, 11, 12, and 17 through 20), the roles of different customers using the same account ID are recited. For example, in claim 9 there is recited at least two roles and one of those roles being a primary cardholder role having primary financial responsibility.

The references cited by the Examiner (**Pickering '445** and **Pickering '965**, collectively the "**Pickering References**") each show a system for consolidating individual company charges (e.g., utility charges) into a single monthly statement. While the Examiner states that the references show a customer ID, an account ID and a presentation ID, Applicants believe the Examiner mischaracterizes or misunderstands the **Pickering References**, or Applicants' invention, or both.

For example, the Examiner states in his remarks (paragraph 4), that the "customer ID , account ID, and presentation ID are interpreted as customer telephone number, customer's account number and customer's name or customer's social security number". First, such a characterization of "customer" ignores the relationship of the two parties involved in the system of the **Pickering References**, namely a utility company (whose charges are being presented to a single customer) and the single customer who has the utility charges consolidated and presented in a single bill for the customer to pay. There is only one customer in the **Pickering References**, and that customer appears at the top of the illustrated statement (Fig. 7 of **Pickering '445** and Fig. 4 of **Pickering '965**). The utility companies having charges consolidated and appearing on the statement are not "customers". Rather, they are the vendors or merchants whose products/services are begin purchased by a customer.

Further, in the **Pickering References**, while a telephone number is shown (which the Examiner appears to interpret as the "customer ID" of Applicants' invention), it is a utility company telephone number and not a "customer number" (it is shown in the **Pickering References** as a "customer service number" to be used by a customer to call a utility company when seeking customer service, and is not a "customer ID associated with each customer", as in claim 1). Further, there is no presentation instrument (e.g., credit card) in **Pickering References**. Also, while the Examiner appears to interpret the "customer name or social security number" in

the **Pickering References** as the presentation ID of Applicants' invention, there is only one customer in the **Pickering References**. There is also no mention of a social security number in the **Pickering References**, and so the Examiner's reference to a "social security number" being Applicants' presentation ID is not understood.

Most importantly, the purpose of the **Pickering References** is completely different and non-analogous to the purpose of Applicants' invention, which is to have a customer ID separate from a presentation ID (and account ID) so that if the presentation instrument is rendered unusable, (e.g., lost or stolen), the presentation instrument may be replaced without having to close the account.

Thus the **Pickering References** do not show or suggest the invention of Applicants. If one were to try to analogize the **Pickering References** to Applicants' invention, they would suggest no more than a conventional credit card account (multiple vendors or merchants having their transactions consolidated or posted at a single credit card account to be paid by a single customer). This is not Applicants' invention and, if anything, the **Pickering References** teach away from Applicants' invention, since they do not teach or suggest multiple customers using a single account but each having their own customer ID, and each using a presentation instrument that is presented to a merchant to conduct transactions.

Further, none of the subject matter of the dependent claims is taught, shown or suggested by the **Pickering References**. For example, the **Pickering References** do not disclose (or suggest) the recited security suspense record of claims 3, 4 and 16. Further, the **Pickering References** do show (or suggest) the roles of the different customers as recited in claims 9, 10, 11, 12, and 17 through 20.

While Applicants believe the original claimed subject matter is not shown or suggested by the **Pickering References**, Applicants have amended each of the independent claims 1, 15 and 23 to recite that "the presentation instrument is presented to a merchant in order to conduct a transaction against the account". This clearly distinguishes the invention from the **Pickering References**, where there is no presentation instrument, and thus clearly no such instrument presented by each of multiple customers to a merchant in order to conduct transaction against an account.

Appl. No. 10/091,653  
Amdt. dated July 9, 2004  
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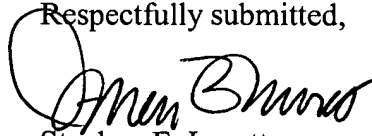
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**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen F. Jewett", is written over a circular stamp or mark.

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